

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

## **MOTION FOR PROTECTIVE ORDER**

Comes now Defendant and pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure and requests the production of certain documents. In support thereof, the Defendant states as follows:

1. The production of these documents is essential to the due process rights of the Defendant.
2. The information in these documents are necessary and essential for the preparation for sentencing in this matter on July 7, 2016.
3. These requests are in the interest of justice.
4. The Defendant requests the disclosure of all Grand Jury transcripts of all members of the St. Louis Metropolitan Police Department who have testified before the Grand Jury relating to this matter.

Wherefore, the Defendant requests the Court enter a Protective Order consistent with the attached Proposed Protective Order and for such other and further orders as the Court may deem just and proper.

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of June 2016 the foregoing **Motion for Protective Order** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager